

November 8, 2019

Submitted via email: hr2w@oehha.ca.gov

Attn: Dr. Carolina Balazs
Office of Environmental Health Hazard Assessment
1515 Clay Street, 16th Floor
Oakland, CA 94612

RE: Human Right to Water Draft Mapping Tool and Report

Dear Dr. Balazs:

Camrosa Water District appreciates the opportunity to provide comments on the Office of Environmental Health Hazard Assessment (OEHHA) Public Review Draft Report entitled, *Achieving the Human Right to Water in California: An Assessment of the State's Community Water Systems* and Draft Mapping Tool. My staff attended the October 17 workshop in Sacramento, which was valuable for learning more about the draft tool and its components.

By way of background, Camrosa is a medium-sized retailer located in Ventura County, with approximately 8,400 connections serving 35,000 customers. We are a progressive and diverse special district providing water for agricultural and M&I needs, including a CSU campus. Our District has a diversified water portfolio of local resources, consisting of 13 wells and a brackish groundwater desalination facility, plus water imported from Metropolitan Water District via Calleguas Municipal Water District.

Camrosa has worked closely with the Association of California Water Agencies (ACWA) and California Municipal Utilities Association (CMUA) on this issue, and we agree with and echo the points raised in their detailed comment letter. In addition, there are three items of particular concern to our agency that we'd like to bring to your attention.

Water Accessibility Scoring Methodology Unfairly Penalizes Smaller Systems

The Water Accessibility component assumes that larger systems inherently possess greater institutional resilience than smaller ones. Based on the current methodology, only systems with 10,000 or more accounts can receive a score of four on the "institutional constraints" indicator; because Camrosa services 8,400 connections, it is impossible for us to score higher than a three. This penalizes small and mid-sized agencies, which may very well have similar, or even less, institutional vulnerability than larger ones. In Camrosa's case, our reserve strength and high credit rating are indicative of our stability as an institution over time, and do not support the assumption that somehow because agencies have fewer service connections that they are less capable of effective management and oversight. Conversely, to presume that larger agencies are automatically *more* competent in this regard is also a false premise.

We ask that this measurement be modified to eliminate biased assumptions about agencies simply based upon their size.

Water Affordability

As the ACWA/CMUA letter points out, the Affordability Component is also problematic. In general, we agree with the argument that water rates alone are not an accurate measure of affordability, as there are a number of costs over which districts have no control; for example, the cost of imported water and the price of energy. Such expenses must be factored into the cost of service for customers through an agency's rates, and these fixed costs will vary widely among agencies, depending upon their location, geography, wholesaler, etc. We strongly encourage a robust discussion among *all* stakeholders to determine how, and whether, an affordability measurement can be part of this tool.

Water Agency Participation

We concur with the request that water agencies be invited to participate actively in developing the tool prior to its finalization, via stakeholder meetings, advisory groups, and/or other means. Since the composite scores are intended for a variety of audiences—the public, regulators, legislators, the media, etc.—it is imperative that information is collected, analyzed, and presented accurately and fairly. Water agencies, with our intimate knowledge of and daily experience with delivering water, are critical to this process.

I understand that at the October 17 workshop, OEHHA staff assured attendees that in no way was this draft tool and report the final version; rather, it is intended to spark conversation and feedback. In this spirit, we look forward to additional opportunities for meaningful engagement with OEHHA and State Water Board staff to develop a tool that is a true collaboration among all stakeholders involved.

Thank you for your consideration of our feedback on this initial draft. Camrosa looks forward being part of the process for developing the Human Right to Water tool to ensure it results in a useful and accurate analysis of how California is progressing on this important policy.

Sincerely,

A handwritten signature in blue ink that reads "Tony Stafford". The signature is fluid and cursive, with the first name "Tony" and last name "Stafford" clearly legible.

Tony Stafford, General Manager

cc: Dr. Lauren Zeise, Director, OEHHA
Mr. Allan Hirsch, Chief Deputy Director, OEHHA
Dr. John Faust, Branch Chief of Community and Environmental Epidemiology Research, OEHHA